

AMENDMENTS TO THE DRAWINGS

The Examiner objected to Figures 1, 2, 3, 4, and 10 of the drawings because these figures contain shaded areas. Replacement Figures 1, 2, 3, 4, and 10 are submitted herewith addressing this objection.

REMARKS

Claims 1-23 were presented for examination, and claims 1-23 are rejected. Thus, claims 1-23 are currently pending in this application, of which claims 1, 9, 16, and 22 are independent. Applicants submit that claims 1-23 are in condition for allowance.

The following comments address all stated grounds of rejection. Applicants respectfully traverse all rejections and urge the Examiner to pass the claims to allowance in view of the remarks set forth below.

Specification Objection

The Examiner objected to the specification because it contains an embedded hyperlink and/or other form of browser-executable code (see page 19, paragraph 0070, lines 9-10 of the specification). Applicants respectfully traverse this objection.

Applicants submit that the hyperlinks are necessary to support the description of the claimed invention in the specification. Furthermore, Applicants submit the hyperlinks are not intended to be active links and are not intended to incorporate any references. Therefore, Applicants respectfully request the Examiner to withdraw the objection to the specification.

Drawing Amendments

The Examiner objected to the drawings as failing to comply with 37 C.F.R. 1.121(d) because Figures 1, 2, 3, 4, and 10 contain shaded areas. Figures 1, 2, 3, 4, and 10 are hereby amended to address this objection. Applicants submit that the above drawing amendments are not directed to any art rejection. No new matter has been introduced.

Claim Amendments

Applicants hereby amend claims 9 and 10 to further clarify and appreciate the Applicants' claimed invention. No new matter has been introduced. Applicants submit all pending claims are in condition for allowance.

CLAIM REJECTIONS UNDER 35 U.S.C. §112**I. Claim 22 Rejected Under 35 U.S.C. §112, First Paragraph**

Claim 22 is rejected under 35 U.S.C. §112, first paragraph, as failing as containing subject matter not described in the specification in such a way as to enable one skilled in the art to make and use the invention. Applicants traverse this rejection.

Specifically, claim 22 is rejected because the recited claim limitation of "simulating" is not described in the specification in such a way as to enable one skilled in the art to which it pertains to make or use the invention. Applicants respectfully disagree with the Examiner's assertion that simulating is not supported in the specification. Applicants respectfully direct the Examiner's attention to paragraphs 106 and 107 on pages 30-31 of the specification. Applicants contend that one skilled in the art would readily recognize and understand the subject matter of simulating in view of the specification and in particular, paragraphs 106 and 107.

In light of the aforementioned arguments, claim 22 enables one skilled in the art to make and use the invention. Therefore, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of claim 22 under 35 U.S.C. §112, first paragraph.

DOUBLE-PATENTING REJECTION**II. Claim 1-23 Provisionally Rejected Under Obviousness-Type Double Patenting Doctrine**

Claims 1-23 are provisionally rejected under the judicially created doctrine of obviousness-type double patenting as claiming the same invention as co-pending U.S. Patent Application No. 10/123,098. Applicants respectfully traverse this rejection and elect to defer addressing the double patenting rejection until the identification of allowable subject matter.

CLAIM REJECTIONS UNDER 35 U.S.C. §102**III. Claims 1-23 Rejected Under 35 U.S.C. §102**

Claims 1-23 are rejected under 35 U.S.C. §102(e) as anticipated by U.S. Patent No. 6,651,072 B1 to Jamtgaard et al. ("Jamtgaard"). Claims 1, 9, 16, and 22 are independent claims. Claims 2-8 depend on and incorporate the patentable subject matter of independent claim 1. Claims 10-15 depend on and incorporate the patentable subject matter of independent claim 9. Claims 17-20 depend on and incorporate the patentable subject matter of independent claim 16, and claim 23 depends on and incorporates the patentable subject matter of independent claim 22. Applicants respectfully traverse this rejection and submit that Jamtgaard fails to disclose each and every element recited in claims 1-23.

A. Claims 1 and 9 Patentably Distinguished Over Jamtgaard

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. Independent claim 1 and amended independent claim 9 recite a system and method claim respectively, and are directed towards a collaborative exchange of Web based content information between

disparate and unrelated content sources. In providing a collaborative exchange of Web based content information, the claimed invention *requests related content from collaborating sites*.

Jamtgaard does not disclose *requesting related content from collaborating sites* as in the claimed invention. Instead, Jamtgaard is focused on reformatting content provided from a content provider to be displayed on a target device's screen. The claimed invention classifies content from a content provider and *requests related content from collaborating sites*. That is, the claimed invention requests from collaborating sites, or other content providers, content related to the content provided by the content provider. In the Office Action, the Examiner cites column 8, lines 62 to column 9, line 39 and column 10, lines 21-47 in Jamtgaard as disclosing a content mapping engine *requesting related content from collaborating sites* as in the claimed invention. The cited sections of Jamtgaard are directed to a layout engine which the Examiner equates to the content mapping engine of the claimed invention. Applicants respectfully disagree with the Examiner that the layout engine of Jamtgaard discloses the claimed feature of *requesting related content from collaborating sites*.

As described in further detail in column 8, lines 4-17 of Jamtgaard, the layout engine processes the content to convert the content into device and protocol specific mark-up language formats. The layout engine provides formatted output referred to as a "presentation shoe," which contains the original HTML content of a webpage reformatted into an appropriate format language and targeted at an information appliance. The presentation shoe is then formatted specifically for the target appliance's screen size, user interface, and protocol. During this processing, Jamtgaard does not describe the layout engine *requesting related content from collaborating sites*. Instead of *requesting related content from collaborating sites*, Jamtgaard processes content provided from a content provider to reformat the content to a target device's screen. Thus, Jamtgaard fails to disclose *requesting related content from collaborating sites*.

Because Jamtgaard fails to disclose *requesting related content from collaborating sites*, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of claims 1 and 9 under 35 U.S.C. §102. Claims 2-8 depend on and incorporate the patentable subject matter of independent claim 1. Claims 10-15 depend on and incorporate the patentable subject matter of independent claim 9. Accordingly, Applicants respectfully request the Examiner to withdraw the rejection of claims 2-8 and 10-15 under 35 U.S.C. §102.

B. Claim 16 Patentably Distinguished Over Jamtgaard

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. Independent claim 16 is directed towards a method for collaborative exchange of related content in a system for exchanging Web based content information between disparate and unrelated content sources. The method includes establishing a consortium of content sources, *defining a content category structure*, and establishing a request for information protocol. The *content category structure definition comprises a format for categorizing all content sources collaborating in the exchange of content within the consortium*.

Jamtgaard does not disclose *defining a content category structure comprising a format for categorizing all content sources collaborating in the exchange of content within the consortium*. Rather, Jamtgaard is focused on reformatting content provided from a web page to the screen size, user interface, and protocol of a target displaying device. In contrast, the claimed invention *defines a content category structure comprising a format for categorizing all content sources collaborating in the exchange of content within the consortium*. That is, the claimed invention provides *a content category structure* for categorizing different content from multiple content providers. Jamtgaard does not *describe a format for categorizing all content source collaborating in the exchange of content within*

the consortium. Instead, Jamtgaard processes content from a content provider from one format to another. Thus, Jamtgaard is not concerned with categorizing different content from multiple content providers.

The Examiner cites column 5, lines 54 to column 6, line 10 and column 10, lines 21-47 in Jamtgaard as disclosing the claimed invention of *defining a content category structure comprising a format for categorizing all content sources collaborating in the exchange of content within the consortium*. The cited sections of Jamtgaard are directed towards the conversions of a web page, such as HTML, into a relationship markup language (RML) and then processed into a Document Object Model (DOM). Applicants respectfully disagree with the Examiner that the cited sections disclose *defining a content category structure comprising a format for categorizing all content sources collaborating in the exchange of content within the consortium*. The RML of Jamtgaard is an XML based language for permitting the mapping of content of a web page into a tree structure by the tree synthesizer to form a DOM (see column 5, lines 60-64). The processing of the web page from a content provider into RML provides an intermediate representation of the web page content into units of information. The RML data is processed further as illustrated in Fig. 5 of Jamtgaard to provide the web page into reformatted content for the specific target display device. As such, instead of providing a structure for *categorizing all content sources collaborating in the exchange of content within the consortium*, Jamtgaard provides a structure for a web page to be reformatted for the characteristics of a specific screen. Thus, Jamtgaard fails to disclose each and every element of independent claim 16.

Furthermore, Jamtgaard does not disclose *content sources collaborating in the exchange of content within the consortium*. In the claimed invention, a consortium comprises a community of content source providers that agree to share information between and among

one another (see Paragraph 52 of this application). Consortium content source providers concerned with a particular category of content are able to define that contents' categorical hierarchical structure between and among themselves. The structure of the claimed inventions comprises a format by which content information may be requested with respect to that category within the consortium. Jamtgaard does not describe a consortium or content sources collaborating in a consortium. Rather, Jamtgaard is concerned with converting a web page into a presentation format based on the screen capabilities of a specific target device. As such, Jamtgaard also fails to disclose *content sources collaborating in the exchange of content within the consortium*.

Because Jamtgaard fails to disclose *defining a content category structure comprising a format for categorizing all content sources collaborating in the exchange of content within the consortium*, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of claims 16 under 35 U.S.C. §102. Claims 17-21 depend on and incorporate the patentable subject matter of independent claim 16. Accordingly, Applicants respectfully request the Examiner to withdraw the rejection of claims 17-21 under 35 U.S.C. §102.

C. Claim 22 Patentably Distinguished Over Jamtgaard

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. Independent claim 22 is directed towards a system for collaborative exchange of Web based content information between disparate and unrelated content sources. The system comprises a web content server disposed at a facility belonging to a particular content provider. The provider provides content through the web server. The system includes a server appliance electronically disposed between the web server and a wide area communication network. The server appliance terminates a HTTP session directed to the web server and initiates a HTTP session

with the web server as a substitute. The system also includes a network client operatively response to user input commands and coupled to communicate over the wide area communication network. The server appliance includes *means for simulating the network client to the content server without intervention by the user.*

Jamtgaard does not disclose a *means for simulating the network client to the content server without intervention by the user.* The Examiner cites column 7, lines 31-47 in Jamtgaard as disclosing the claimed invention of a *means for simulating the network client to the content server without intervention by the user.* However, Applicants contend Jamtgaard discloses this feature of the claimed invention. The server appliance of the claimed invention provides a means for automated transaction execution within a web application on behalf of a client (see Paragraphs 106 and 107 of this application). When a URL is accessed, the server appliance simulates the client to the content server by translating the URL into an automated user session, executing the corresponding next step in the transaction series, and redirecting the response to the client. In contrast to the claimed invention, Jamtgaard does not describe a means for an automated user session and automated transaction execution within a web application on behalf of a client. Rather, the cited sections of Jamtgaard are directed towards an appliance connection handler operating as a Web Server for a requesting information appliance to broker transactions between the information appliance and transaction server. As such, Jamtgaard fails to disclose each and every element of independent claim 22.

Because Jamtgaard fails to disclose a *means for simulating the network client to the content server without intervention by the user*, Applicants respectfully request the Examiner to reconsider and withdraw the rejection of claim 22 under 35 U.S.C. §102. Claim 23 depends on and incorporates the patentable subject matter of independent claim 22. Accordingly, Applicants respectfully request the Examiner to withdraw the rejection of claim 23 under 35 U.S.C. §102.

CONCLUSION

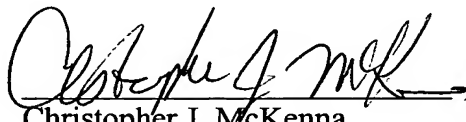
In light of the aforementioned arguments, Applicants contend that each of the Examiners rejections has been adequately addressed and all of the pending claims are in condition for allowance. Accordingly, Applicants respectfully request reconsideration, withdrawal of all grounds of rejection, and allowance of all of the pending claims.

Should the Examiner feel that a telephone conference with Applicants' attorney would expedite prosecution of this application, the Examiner is urged to contact the Applicants' attorney at the telephone number identified below.

Respectfully submitted,

LAHIVE & COCKFIELD, LLP

Dated: July 8, 2005


Christopher J. McKenna
Registration No. 53,302
Attorney for Applicants

Lahive & Cockfield, LLP
28 State Street
Boston, MA 02109
(617) 227-7400